## **EXHIBIT 1**

## AFFIDAVIT OF LENA SHOU KUO

# IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

HEE JIN LOWERY and	)	
JOHN LOWERY, Individually, and	)	
as Assignees of Shou & Shou, Inc.,	)	
Plaintiffs,	)	
ridiitiiis,	)	
v.	)	
•	)	Case No.: 1:20-cv-05148-TWT
AMGUARDINSURANCE	)	
COMPANY,	)	
,	)	
	(	
Defendant.	)	
Delendant.	)	

## AFFIDAVIT OF LENA SHOUKUO

Personally appeared before the undersigned officer duly authorized by law to administer oaths, Lena Shou Kuo who, after being duly sworn, states as follows:

1. My name is Lena Shou Kuo. I am over the age of 21 and not suffering from any disability. I am competent to provide testimony contained herein and provide this affidavit for use in the above captioned case and all other purposes permitted by law. I have personal knowledge of the facts stated herein and attest that they are true and correct.

- 2. For many years, I and my siblings, Lenny Shou and Lili Shou, have owned various Asian style restaurants in the Atlanta area. In 2013, we had three restaurants which were operated under the name "Noodle." Each restaurant was owned by me and my siblings under separate corporate names. This included the Noodle restaurant located at 3693 Main Street, College Park, Georgia, incorporated as Shou & Shou, Inc.
- 3. In 2013, I talked to our insurance agent about obtaining insurance for our three Noodle restaurant locations. The agent placed us with AmGuard Insurance Company which issued a business owners policy listing all three locations, including the Noodle Restaurant at 3693 Main Street, College Park, and a workers compensation policy covering the same restaurants. The business owners' policy was renewed every year for five years while the workers compensation policy was renewed only once or twice.
- 4. Specifically, from 2013 through 2018, AmGuard Insurance Company issued the following business owner's policies:
- Policy number NOBP404703; policy period September 21, 2013, to September 21, 2014 (Attachment A).
- b. Policy number NOBP506733; policy period September 21, 2014, to September 21, 2015 (Attachment B).

- c. Policy number NOBP610038; policy period September 21, 2015, to September 21, 2016 (Attachment C).
- d. Policy number NOBP749206; policy period September 21, 2016, to September 21, 2017 (Attachment D).
- e. Policy number NOBP827149; policy period September 21, 2017, to September 21, 2018 (Attachment E).
- f. Policy number NOBP92994; policy period September 21, 2018, to September 21, 2019 (Attachment F).
- 5. All the business owner policies issued by AmGuard Insurance Company to my family's restaurants named "Noodle, Inc." as the named insured and listed the Noodle College Park restaurant as "LOCATION: 001 BUILDING: 001."
- 6. "Noodle, Inc." is not the actual corporate name of any of our restaurants. Rather, "Noodle" is merely the tradename of Shou & Shou, Inc. and the other restaurants that were insured.
- 7. Neither I nor my siblings have ever had any ownership interests in any corporation by the name "Noodle, Inc.," and there has never been a time when any of my family's restaurants was owned or were associated with a corporation named "Noodle, Inc."

- 8. From the beginning, all premium notices for the aforementioned policies were sent to "Noodle, Inc." at 3693 Main Street, College Park, Georgia and were paid on Shou & Shou's operating account.
- 9. In 2016, a patron by the name of Eled Addus filed a lawsuit for injuries sustained at the Noodle restaurant located at 3693 Main Street, College Park. Through my agent, I turned this lawsuit over to AmGuard Insurance Company to handle. AmGuard assigned an attorney to represent the restaurant, and I cooperated fully.
- 10. During the *Addus* case, I explained the corporate structure and ownership interests of Shou & Shou, Inc. in the Noodle restaurant located at 3693 Main Street, College Park to the attorney assigned by AmGuard. It is my understanding that the attorney substituted Shou & Shou, Inc. into the lawsuit as the proper party, and he continued to defend us through settlement of the case.
- AmGuard or otherwise ever inform us that Shou & Shou, Inc. was not insured under the business owners' policy or that there was any question about coverage for Shou & Shou, Inc. AmGuard did not cancel the policy and did not cease accepting premiums from Shou & Shou, Inc. Rather, it continued to insure us under the tradename Noodle, Inc. and renewed the policy for a fifth time in

September of 2018 with one remaining location, 3693 Main Street, College Park, Georgia 30337.

- 12. In 2018, a patron by the name of Zuri Zahara Love filed a lawsuit against Shou & Shou, Inc. and others for injuries sustained at the Noodle restaurant located at 3693 Main Street, College Park on December 1, 2016. Through my agent, I turned this lawsuit over to AmGuard Insurance Company to handle.
- 13. AmGuard Insurance Company assigned an attorney to represent the restaurant in the *Love* lawsuit, and we cooperated fully. We informed the attorney assigned by AmGuard that Noodle is the tradename of the restaurant, but it is owned and operated by Shou & Shou, Inc. doing business as Noodle. After providing the attorney this information, AmGuard did not deny coverage, cancel the policy or cease accepting premiums from Shou & Shou, Inc.
- 14. In July of 2019, Shou & Shou, Inc. was served with a lawsuit filed by Hee Jin and John Lowery for injuries Mrs. Lowery sustained on July 26, 2017, at the Noodle restaurant located at 3693 Main Street, College Park, Georgia.
- 15. Through my agent, I turned the *Lowery* lawsuit over to AmGuard Insurance Company to handle. AmGuard Insurance Company refused to defend and indemnify Shou & Shou, Inc. claiming it was not a named insured, additional insured, or otherwise an insured under the policy.

- 16. Because AmGuard denied coverage, Shou & Shou, Inc. was forced to hire its own attorney and defend itself. We reached a settlement with Plaintiffs in 2020 wherein we agreed to a consent judgment in their favor and an assignment of claims. A true and accurate copy of the consent judgment is attached hereto as Attachment G. A true and accurate copy of the assignment is Attachment H.
- 17. From September 2013 until AmGuard's denial of coverage in 2019, it was always my belief and understanding that Shou & Shou, Inc. had liability insurance coverage through AmGuard of \$1,000,000.00 per occurrence. Shou & Shou, Inc. paid all of the premiums, and its location at 3693 Main Street, College Park, Georgia was listed as Location 1 on all of the policies. AmGuard hired lawyers to represent Shou & Shou and settled cases brought against it.
- 18. From the beginning and with each policy renewal, it was my intent that all of my family's Noodle locations be listed as insureds under the policies issued by AmGuard Insurance Company including Shou & Shou, Inc. which owned and operated the Noodle restaurant at 3693 Main Street, College Park, Georgia. From the time AmGuard began insuring my family's restaurants, Shou & Shou, Inc. should have been listed as the named insured or an additional insured.

FURTHER AFFIANT SAYETH NOT.

Lena Shou Kuo

SWORN TO and SUBSCRIBED

before me this 15th day of May 2022.

Notary Public My Commission Expires: 02/17



## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

AmGUARD Insurance Company A Stock Company

Policy No.: NOBP404703 Renewal of: NEW

## POLICY INFORMATION PAGE

[1] Named Insured and Mailing Address

Noodle Inc 3693 Main Street College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE 103 Midway Drive Suite A Cornelia, GA 30531

[3] Policy Period

From September 21, 2013 to September 21, 2014, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Asian Food

[5] Coverage

This policy consists of the Coverage Forms listed on the Schedule of Forms and Endorsements (IIT SF 01 05).

[6] Premium

The premium shown below may be subject to adjustment. Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE



[7] Payment of Premium

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.



**ATTACHMENT "A"** 

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

## SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001

3693 Main Street

College Park, GA 30337

**Fulton County** 

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

### **MANDATORY COVERAGES:**

#### Building

Limit of Insurance \$430,030 Valuation Replacement Cost

Coverage Includes:

Automatic Increase - Building limit applies up to 2% per year

#### **Business Personal Property**

Limit of Insurance \$128,900

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

#### **OPTIONAL COVERAGES:**

#### **BOP Location Level Information**

Awnings Coverage	
Limit	
Building Coverage	\$2,500
Limit	<b>.</b>
Valuation	\$430,030
Inflation Guard %	Replacement Cost
Business Personal Property Coverage	2
Limit	P100 000
Seasonal Increase Percent	\$128,900
Liability	25
Gross Sales at this Location	\$350,000
Limit	\$350,000
Accounts Receivable	Included
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Debris Removal	Ψ20,000
Limit	25%/\$10,000
Equipment Breakdown Coverage (HSB)	2070, 4 10 000
Inspection Contact Name	Lena Shou
Phone Number	404-488-2525
Money and Securities	707-700-2020

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703	Effective Date: 09/21/2013
On Premises Limit	
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit Limit	AND THE RESIDENCE AND ADMINISTRATION OF THE PROPERTY OF THE PR
Outdoor Property	\$10,000
Limit	
Outdoor Signs - Optional Coverage	\$10,000
Limit Coverage	
Restaurant Coverage	\$5,000
Food contamination Limit	
Advertising Expense Limit	\$10,000
Spoilage Per Occurrence Limit	\$3,000
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000
Lock Replacement	\$5,000
Merchandise Withdrawal Expenses	\$1,000
Ordinance or Law - Equipment Coverage	\$25,000
Credit Card Slips	Building/BPP Limit
Valuable Papers and Records	\$10,000
On-Premises Limit	
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	\$25,000
Covered Property Limit	
Business Income and Extra Expense Limit	\$5,000
	\$5,000

LOCATION: 002 BUILDING: 001 205 E Ponce De Leon Ave Decatur, GA 30030 Dekalb County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

#### **MANDATORY COVERAGES:**

Business Personal Property Limit of Insurance \$257,700 Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

#### **OPTIONAL COVERAGES:**

#### **BOP Location Level Information**

Awnings Coverage

Limit Business Personal Property Coverage	\$2,500
Limit	\$257,700
Seasonal Increase Percent	25

## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703	Effective Date: 09/21/2013
Liability	
Gross Sales at this Location	
Limit	\$250,000
Accounts Receivable	Included
On-Premises Limit	
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	
Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	COMMITTED AND THE STATE OF THE
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit	The state of the s
Outdoor Property	\$10,000
Limit	
Outdoor Signs - Optional Coverage	\$10,000
Limit	
Restaurant Coverage	\$5,000
Food contamination Limit	
Advertising Expense Limit	\$10,000
Spoilage Per Occurrence Limit	\$3,000
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000 \$5,000
Lock Replacement	\$5,000 \$1,000
Merchandise Withdrawal Expenses	\$1,000 \$25,000
Ordinance or Law - Equipment Coverage	\$25,000 Building (BDD Line)
Credit Card Slips	Building/BPP Limit
Valuable Papers and Records	\$10,000
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	Ψ20,000
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000
	ψ0,000

LOCATION: 003 BUILDING: 001

903A W Peachtree St Atlanta, GA 30309 Fulton County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

#### **MANDATORY COVERAGES:**

Business Personal Property Limit of Insurance \$257,700

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703 Effective Date: 09/21/2013

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

### **OPTIONAL COVERAGES:**

BOP	Location	Level	Information
			·····VIIIIauoii

Awn	ings	Cov	era	ae	
126			annson a	PARWINANA	ZEVE

Limit	ES HOUSE SCALES AND
Business Personal Property Coverage	\$2,500
Limit Limit	The state of the s
Seasonal Increase Percent	\$257,700
Liability	25
Gross Sales at this Location	And the state of t
Limit	\$250,000
Accounts Receivable	Included
On-Premises Limit	
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	
Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	The state of the s
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit	
Outdoor Property	\$10,000
Limit	£40,000
Outdoor Signs - Optional Coverage	\$10,000
Limit	ΦE 000
Restaurant Coverage	\$5,000
Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000 \$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000 \$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	。 第一章
Credit Card Slips	Building/BPP Limit \$10,000
/aluable Papers and Records	<b>⊅ 10,000</b>
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000 \$25,000
Vater Back-up and Sump Overflow	\$25,000
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000 \$5,000
•	\$5,000

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

## SECTION II - LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements

Coverage	Limits of Insurance
Liability and Medical Expenses - Each Occurrence General Aggregate (Other than Products and Completed Operations) Products & Completed Operations Aggregate Medical Expenses (Each Person) Liability Property Damage Deductible Liability Deductible - Bodily Injury	\$1,000,000 \$2,000,000 \$2,000,000 \$5,000 None None

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703 Effective Date: 09/21/2013

## POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Limit	\$50,000 combined B. II. II. IDD=
Business Income & Extra Expense Limit	\$50,000 combined Building/BPP
	ALS UP TO 12 MONTHS
Damage To Premises Rented To You Limit	the second and the se
Electronic Data	\$50,000
Limit	transport to the state of the s
Employee Dishonesty	\$10,000
Limit	
Fire Department Service Charge	\$10,000
Limit	POT 000
Fire Extinguisher Systems Recharge Expense	\$25,000
Limit	\$E 000
Forgery or Alteration	\$5,000
Limit	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold) Property Limit	
Business Income/EE Number of Days	\$15,000
Fungi or Bacteria Property Damage Aggregate Limit	30
Glass Expense	\$50,000
Limit	Actual Loss Sustained
Interruption of Computer Operations	Actual Loss Sustained
Limit	\$10,000
Liquor Liability	<b>4.19,000</b>
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
Loss by Theft of furs, fur garments, garments trimmed with fur	
-OSS by Theft of jewelry watches watch movements in the	\$2,500
oss by Theft of jewelry, watches, watch movements, jewels, pearls, proof of silver, platinum and other precious alloys or metals  Limit	recious and semi-precious stones, bullion,
	\$5,000
oss by Theft of patterns, dies, molds and forms	
Money Orders and "Counterfeit Money"	\$2,500
Limit Counterless Woney	100/3-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1
Newly Acquired Or Constructed Property - Buildings	\$1,000
Limit - Buildings	
	25% of Building Limit/Not more than
Newly Acquired Or Constructed Property - Business Personal Property	
Limit Limit	SCACON A CONTRACTOR OF THE PROPERTY OF THE PRO
Personal Effects	\$250,000
Limit	PE 000
Personal Property Off Premises Limit	\$5,000
Pollutant Clean Up and Removal	\$10,000
Limit	
reservation of Property	\$10,000
reservation of Property	

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GUARD00020

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

Certified Acts

Include Coverage



## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/16/2014

Amguard Insurance Company
A Stock Company

Policy No.: NOBP506733

Renewal of: NOBP404703

#### POLICY INFORMATION PAGE

[1] Named Insured and Mailing Address

Noodle Inc 3693 Main Street College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE 103 Midway Drive Suite A Cornelia, GA 30531

[3] Policy Period

From September 21, 2014 to September 21, 2015, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Full-Service Restaurants

[5] Coverage

This policy consists of the Coverage Forms listed on the **Schedule of Forms and Endorsements** (IIT SF **01 05**).

[6] Premium

The premium shown below may be subject to adjustment. Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE



[7] Payment of Premium

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.



ATTACHMENT "B"

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

## SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001

3693 Main Street College Park, GA 30337 Fulton County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

### **MANDATORY COVERAGES:**

#### Building

Limit of Insurance \$438,631 Valuation Replacement Cost

Coverage Includes:

Automatic Increase - Building limit applies up to 2% per year

### **Business Personal Property**

Limit of Insurance \$128,900

**Valuation Replacement Cost** 

Coverage includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

### OPTIONAL COVERAGES:

### **BOP Location Level Information**

**Awnings Coverage** 

Limit	
Building Coverage	\$2,500
Limit	<b>*</b>
Valuation	\$438,631
Inflation Guard %	Replacement Cost
Business Personal Property Coverage	2
Limit	\$128,900
Seasonal Increase Percent	25
Liability	20
Gross Sales at this Location	\$350,000
Limit	Included
Accounts Receivable	moluded
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Debris Removal	<del>+20,000</del>
Limit	25%/\$10,000
Equipment Breakdown Coverage (HSB)	
Inspection Contact Name	Lena Shou
Phone Number	404-488-2525
Money and Securities	00 2 00 50 5 <del></del>

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/16/2014

Policy No.: NOBP506733	Effective Date: 09/21/2014	
On Premises Limit		
Off Premises Limit	\$5,000	
Ordinance or Law - Increased Cost Of Construction	\$5,000	DAMAGE LO
Limit	\$10,000	Valence in
Outdoor Property	\$10,000	
Limit	040.000	
Outdoor Signs - Optional Coverage Limit	\$10,000	
Restaurant Coverage	\$5,000	
Food contamination Limit		No.
Advertising Expense Limit	\$10,000	
Spoilage Per Occurrence Limit	\$3,000	ASSESSED OF
Brands and Labels	\$10,000	
Delivery Errors and Omissions	BPP Limit	HISTORY
Fine Arts	\$10,000	
Reward Payment	\$25,000	MANAGOS.
Lock Replacement	\$5,000	
Merchandise Withdrawal Expenses	\$1,000	APRIL T
Ordinance or Law - Equipment Coverage	\$25,000	
Credit Card Slips	Building/BPP Limit	Marine.
Valuable Papers and Records	\$10,000	
On-Premises Limit		No.
Off-Premises Limit	\$25,000	
Water Back-up and Sump Overflow	\$25,000	Man of
Covered Property Limit		
Business Income and Extra Expense Limit	\$5,000	
Little Little Little Lypense Little	\$5,000	and the same

LOCATION: 002 BUILDING: 001 205 E Ponce De Leon Ave Decatur, GA 30030 Dekalb County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

#### MANDATORY COVERAGES:

Business Personal Property
Limit of Insurance \$257,700
Valuation Replacement Cost
Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

#### **OPTIONAL COVERAGES:**

#### **BOP Location Level Information**

**Awnings Coverage** 

Limit	<b>60 500</b>
Business Personal Property Coverage	\$2,500
Limit	\$257.700
Seasonal Increase Percent	25

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/16/2014

Policy No.: NOBP506733	Effective Date: 09/2	21/2014
Liability		
Gross Sales at this Location		
Limit	\$250,000	
Accounts Receivable	Included	THE RESIDENCE OF THE PARTY OF T
On-Premises Limit		
Off-Premises Limit	\$25,000	
Debris Removal	\$25,000	The state of the s
Limit	0-0/0	
Equipment Breakdown Coverage (HSB)	25%/\$10,000	
Inspection Contact Name		
Phone Number	Lena Shou	
Money and Securities	404-488-2525	
On Premises Limit		MANA LANG AND
Off Premises Limit	\$5,000	
Ordinance or Law - Increased Cost Of Construction	\$5,000	
Limit	C40 000	
Outdoor Property	\$10,000	
Limit	640,000	and the fact of the plant of the company of the plant of the company of the compa
Outdoor Signs - Optional Coverage	\$10,000	
Limit	\$5,000	(c) the real price of the second
Restaurant Coverage	\$5,000	
Food contamination Limit	¢10,000	
Advertising Expense Limit	\$10,000	
Spoilage Per Occurrence Limit	\$3,000 \$10,000	
Brands and Labels	\$10,000 BPP Limit	
Delivery Errors and Omissions	\$10,000	
Fine Arts	\$25,000	
Reward Payment	\$5,000	
Lock Replacement	\$1,000	
Merchandise Withdrawal Expenses	\$25,000	
Ordinance or Law - Equipment Coverage	Building/BPP Limit	
Credit Card Slips	\$10,000	
Valuable Papers and Records	Ψ10,000	
On-Premises Limit	\$25,000	10.10
Off-Premises Limit	\$25,000	
Water Back-up and Sump Overflow	+=0,000	
Covered Property Limit	\$5,000	
Business Income and Extra Expense Limit	\$5,000	Berthalin Charles Co.

LOCATION: 003 BUILDING: 001

903A W Peachtree St Atlanta, GA 30309 Fulton County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

#### **MANDATORY COVERAGES:**

Business Personal Property Limit of Insurance \$257,700

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/16/2014

Policy No.: NOBP506733 Effective Date: 09/21/2014

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

## **OPTIONAL COVERAGES:**

BOP Locatio	n Level	Information
-------------	---------	-------------

Awnin	as	Cov	erag	A
TOTAL STREET, THE PARTY OF THE		THE STATE OF THE S	2.49	·

Limit	
Business Personal Property Coverage	\$2,500
Limit	
Seasonal Increase Percent	\$257,700
Liability	25
Gross Sales at this Location	
Limit	\$250,000
Accounts Receivable	Included
On-Premises Limit	<b>\$0.5</b> 000
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	2 FOX 10 A SO
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	
Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	\$5,000
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$3,000
Limit	\$10,000
Outdoor Property	Ψ10,000
Limit	\$10,000
Outdoor Signs - Optional Coverage	Ψ10,000
Limit	\$5,000
Restaurant Coverage	
Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
/aluable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Nater Back-up and Sump Overflow	420,000
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000
	45,555

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

## SECTION II - LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

Coverage	l imite of Incure
Liability and Medical Expenses - Each Occurrence General Aggregate (Other than Products and Completed Operations) Products & Completed Operations Aggregate Medical Expenses (Each Person) Liability Property Damage Deductible Liability Deductible - Bodily Injury	\$1,000,000 \$2,000,000 \$2,000,000 \$5,000 None None

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/16/2014

Policy No.: NOBP506733 Effective Date: 09/21/2014

## POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Business Income & Extra Expense	\$50,000 combined Building/BPP
Limit	
Damage To Premises Rented To You	ALS UP TO 12 MONTHS
Limit	\$50,000
Electronic Data	\$50,000
Limit	\$10,000
Employee Dishonesty	4.0,000
Limit Fire Department Semiles Ch	\$10,000
Fire Department Service Charge Limit	recommended and the commended of the com
Fire Extinguisher Systems Recharge Expense	\$25,000
Limit Systems Recharge Expense	
Forgery or Alteration	\$5,000
Limit	The state of the s
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	\$10,000
Property Limit	
Business Income/EE Number of Days	\$15,000
Fungi or Bacteria Property Damage Aggregate Limit	30 \$50,000
Glass Expense	\$30,000
Limit	Actual Loss Sustained
nterruption of Computer Operations	and the second and th
Limit	\$10,000
Liquor Liability	Control of the Contro
Liquor Liability Option Common Cause Limit	Liquor Liability Coverage
Aggregate Limit	\$1,000,000
Gross Annual Liquor Receipts	\$2,000,000
oss by Theft of furs, fur garments, garments trimmed with fur	\$100,000
Limit Limit of furs, fur garments, garments trimmed with fur	STANDARD ST
oss by Theft of jewelry, watches, watch movements, jewels, pearls, pr	\$2,500
gold, silver, platinum and other precious alloys or metals	ecious and semi-precious stones, bullion,
Limit	\$5,000
oss by Theft of patterns, dies, molds and forms	\$3,000
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
lewly Acquired Or Constructed Property - Buildings	The second of th
Limit	25% of Building Limit/Not more than
Lavelte A	
lewly Acquired Or Constructed Property - Business Personal Property	
Limit Personal Effects	\$250,000
Limit	The state of the s
Personal Property Off Premises	\$5,000
Limit Control of Premises	
ollutant Clean Up and Removal	\$10,000
Limit	
reservation of Property	\$10,000

**BUSINESSOWNER'S POLICY DECLARATIONS** 

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

Certified Acts
Include Coverage



BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/22/2015

AmGUARD Insurance Company
A Stock Company

Policy No.: NOBP610038

Renewal of: NOBP506733

#### POLICY INFORMATION PAGE

[1] Named Insured and Mailing Address

Noodle Inc 3693 Main Street College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE 103 Midway Drive Suite A Cornelia, GA 30531

[3] Policy Period

From September 21, 2015 to September 21, 2016, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Full-Service Restaurants

[5] Coverage

This policy consists of the Coverage Forms listed on the Schedule of Forms and Endorsements (IIT SF 01 05).

[6] Premium

The premium shown below may be subject to adjustment. Certified Acts of Terrorism TOTAL POLICY PREMIUM TOTAL PAYABLE



[7] Payment of Premium

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.



ATTACHMENT "C"

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/22/2015

Policy No.: NOBP610038

Effective Date: 09/21/2015

## SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001

3693 Main Street College Park, GA 30337 Fulton County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

#### **MANDATORY COVERAGES:**

#### Building

Limit of Insurance \$447,404 Valuation Replacement Cost

Coverage Includes:

Automatic Increase - Building limit applies up to 2% per year

#### **Business Personal Property**

Limit of Insurance \$128,900 Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

#### **OPTIONAL COVERAGES:**

**Awnings Coverage** 

<b>Building Coverage</b>	\$2,500
Limit	\$447,404
Valuation	
Inflation Guard %	Replacement Cost
Business Personal Property Coverage	2
limit	\$128.900
Seasonal Increase Percent	the state of the s
Liability	25
Gross Sales at this Location	<b>POFO</b> 000
Limit	\$350,000
Accounts Receivable	Included
On-Premises Limit	<b>PAF 000</b>
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	
Equipment Breakdown Coverage (HSB)	25%/\$10,000

## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/22/2015

Policy No.: NOBP610038	Effective Date:	09/21/2015
Inspection Contact Name		
Phone Number	Lena Shou	
Money and Securities	404-488-2525	A STATE OF THE STA
On Premises Limit		
Off Premises Limit	\$5,000	
Ordinance or Law - Increased Cost Of Construction	\$5,000	
Limit		
Outdoor Property	\$10,000	
Limit		TO STREET SHEEL & AMERICAN SHEEL & AMERICAN SHEEL & STREET
Outdoor Signs - Optional Coverage	\$10,000	
Limit	<b>A</b> 5 000	#ESECORES FOR a filter or available of a filter delegation of the second
Restaurant Coverage	\$5,000	
Food contamination Limit	<b>6</b> 40.000	The state of the s
Advertising Expense Limit	\$10,000	
Spoilage Per Occurrence Limit	\$3,000	
Brands and Labels	\$10,000	
Delivery Errors and Omissions	BPP Limit	Company of the Compan
Fine Arts	\$10,000	
Reward Payment	\$25,000	
Lock Replacement	\$5,000 \$1,000	
Merchandise Withdrawal Expenses	\$25,000	
Ordinance or Law - Equipment Coverage	THE RESERVE AND ADDRESS OF THE PARTY OF THE	
Credit Card Slips	Building/BPP Limit \$10,000	
Valuable Papers and Records	\$10,000	and the state of t
On-Premises Limit	\$25,000	
Off-Premises Limit	\$25,000	
Water Back-up and Sump Overflow	Ψ20,000	
Covered Property Limit	\$5,000	
Business Income and Extra Expense Limit	\$5,000	

LOCATION: 002 BUILDING: 001

903A W Peachtree St Atlanta, GA 30309 Fulton County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

#### **MANDATORY COVERAGES:**

Business Personal Property Limit of Insurance \$257,700 Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

### OPTIONAL COVERAGES:

Awnings Coverage

Limit

Business Personal Property Coverage

\$2,500

## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/22/2015

Policy No.: NOBP610038	
	<b>Effective Date:</b> 09/21/2015
Limit	
Seasonal Increase Percent	\$257,700
Liability	25
Gross Sales at this Location	
Limit	\$250,000
Accounts Receivable	Included
On-Premises Limit	007.000
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	250/1640,000
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	10000
Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	\$5 000
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit	\$10,000
Outdoor Property	\$10,000
Limit	\$10,000
Outdoor Signs - Optional Coverage	Ψ10,900
Limit	\$5,000
Restaurant Coverage	ψ0,000
Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
Valuable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000
	W-21222

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/22/2015

Policy No.: NOBP610038

Effective Date: 09/21/2015

## SECTION II - LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

Coverage	imits of Insurance
Liability and Medical Expenses - Each Occurrence General Aggregate (Other than Products and Completed Operations) Products & Completed Operations Aggregate Medical Expenses (Each Person) Liability Property Damage Deductible Liability Deductible - Bodily Injury	\$1,000,000 \$2,000,000 \$2,000,000 \$5,000 None None

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/22/2015

Policy No.: NOBP610038 Effective Date: 09/21/2015

## POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Limit Business Income & Extra Expense	\$50,000 combined Building/BPP
Limit	Winds Management and Assessment and
Damage To Premises Rented To You Limit	ALS UP TO 12 MONTHS
Electronic Data	\$50,000
Limit	
Employee Dishonesty	\$10,000
Limit	\$10,000
Fire Department Service Charge Limit	<b>4</b> 10,000
	\$25,000
Fire Extinguisher Systems Recharge Expense Limit	
Forgery or Alteration	\$5,000
Limit	
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	\$10,000
Property Limit	\$15,000
Business Income/EE Number of Days	\$15,000 30
Fungi or Bacteria Property Damage Aggregate Limit	\$50,000
Glass Expense Limit	Company Landing Designation of the Company of the C
Interruption of Computer Operations	Actual Loss Sustained
Limit Computer Operations	
Liquor Liability	\$10,000
Liquor Liability Option	
Common Cause Limit	Liquor Liability Coverage
Aggregate Limit	\$1,000,000
Gross Annual Liquor Receipts	\$2,000,000 \$100,000
Loss by Theft of furs, fur garments, garments trimmed with fur	Ψ100,000
LIMIL	\$2,500
Loss by Theft of jewelry, watches, watch movements, jewels, pearls, pr gold, silver, platinum and other precious alloys or metals Limit	PARA NO (COLD Y ) NOT PROPRIES AND
Loss by Theft of patterns, dies, molds and forms	\$5,000
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
Newly Acquired Or Constructed Property - Buildings Limit	
CHILD PROVIDE AND ASSESSED.	25% of Building Limit/Not more than
Newly Acquired Or Constructed Property - Business Personal Property	
Personal Effects	\$250,000
Limit	
	\$5,000
ersonal Property Off Premises	\$10,000
Limit	\$10,000
Limit	040,000
Limit Pollutant Clean Up and Removal Limit	\$10,000
Pollutant Clean Up and Removal	\$10,000 Within 30 Days

**BUSINESSOWNER'S POLICY DECLARATIONS** 

Issued: 09/22/2015

Policy No.: NOBP610038

Effective Date: 09/21/2015

Certified Acts Include Coverage



## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/14/2016

## AmGUARD Insurance Company A Stock Company

Policy No.: NOBP749206

Renewal of: NOBP610038

#### POLICY INFORMATION PAGE

[1] Named Insured and Mailing Address

Noodle Inc 3693 Main Street College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE 103 Midway Drive Suite A Cornelia, GA 30531

[3] Policy Period

From September 21, 2016 to September 21, 2017, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Full-Service Restaurants

[5] Coverage

This policy consists of the Coverage Forms listed on the Schedule of Forms and Endorsements (IIT SF 01 05).

[6] Premium

The premium shown below may be subject to adjustment. Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE



[7] Payment of Premium

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.



ATTACHMENT "D"

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206 Effective Date: 09/21/2016

## SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001

3693 Main Street College Park, GA 30337 Fulton County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

#### **COVERAGES:**

Awnings Coverage	
Limit	¢2 500
Building Coverage	\$2,500
Limit	\$456,352
Valuation	Replacement Cost
Inflation Guard %	2
Business Personal Property Coverage	4
Limit	\$128,900
Seasonal Increase Percent	25
Liability	25
Gross Sales at this Location	\$350,000
Limit	Included
Accounts Receivable	moladea
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Debris Removal	420,000
Limit	25%/\$10,000
Equipment Breakdown Coverage (HSB)	and the state of t
Inspection Contact Name	Lena Shou
Phone Number	404-488-2525
Money and Securities	2020
On Premises Limit	\$5,000
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	
Limit Outdoor Program	\$10,000
Outdoor Property Limit	
	\$10,000
Outdoor Signs - Optional Coverage Limit	
	\$5,000
Restaurant Coverage	
Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206	<b>Effective Date:</b> 09/21/2016
Spoilage Per Occurrence Limit	
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000
Lock Replacement	\$5,000
Merchandise Withdrawal Expenses	\$1,000
Ordinance or Law - Equipment Coverage	\$25,000
Credit Card Slips	Building/BPP Limit
Valuable Papers and Records	\$10,000
On-Premises Limit	
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	\$25,000
Covered Property Limit	STATE WAS ARRESTED TO SHOW THE PARTY OF THE
Business Income and Extra Expense Limit	\$5,000
Expense Limit	\$5,000

LOCATION: 002 BUILDING: 001

903A W Peachtree St Atlanta, GA 30309 Fulton County

Property Deductible: \$1,000 Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

#### **COVERAGES:**

А	AA I	Ш	П	gs	CO	٧e	ra	a	е
See .		2019		N 1555	PORTON OF	1000000	SECTION AND ADDRESS OF THE PERSON AND ADDRES	98680	NO.

Limit	\$2,500
Business Personal Property Coverage	\$2,500
Limit	\$257,700
Seasonal Increase Percent	25
Liability	20
Gross Sales at this Location	\$250,000
Limit	Included
Accounts Receivable	included
On-Premises Limit	\$25,000
Off-Premises Limit	
Debris Removal	\$25,000
Limit	25%/\$10,000
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	Lena Shou
Phone Number	
Money and Securities	404-488-2525
On Premises Limit	\$5,000
Off Premises Limit	\$5,000 \$5,000
Ordinance or Law - Increased Cost Of Construction	\$3,000
Limit	\$10,000
Outdoor Property	\$10,000
Limit	\$10,000
Outdoor Signs - Optional Coverage	\$10,000
Limit	25,000
	\$5,000

## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206	<b>Effective Date:</b> 09/21/2016
Restaurant Coverage	
Food contamination Limit	
Advertising Expense Limit	\$10,000
Spoilage Per Occurrence Limit	\$3,000
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000
Lock Replacement	\$5,000
	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
Valuable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	Ψ25,000
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	
	\$5,000

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206

Effective Date: 09/21/2016

## SECTION II - LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

Coverage	Limits of Insurance
Liability and Medical Expenses - Each Occurrence General Aggregate (Other than Products and Completed Operations) Products & Completed Operations Aggregate Medical Expenses (Each Person) Liability Property Damage Deductible Liability Deductible - Bodily Injury	\$1,000,000 \$2,000,000 \$2,000,000 \$5,000 None None

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206 Effective Date: 09/21/2016

### POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Limit  Business Incomo 2 Futur F	\$50,000 combined Building/BPP
Business Income & Extra Expense Limit	
Damage To Premises Rented To You	Actual Loss Sustained up to 12 Months
Limit	15/27/hot 2015 - 1-10000000000000000000000000000000
Electronic Data	\$50,000
Limit	\$10,000
Employee Dishonesty	\$10,000
Limit	\$10,000
Fire Department Service Charge	\$10,000
Limit	\$25,000
Fire Extinguisher Systems Recharge Expense	
Limit	\$5,000
Forgery or Alteration Limit	
	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	
Property Limit Business Income/EE Number of Day	\$15,000
Business Income/EE Number of Days	30
Fungi or Bacteria Property Damage Aggregate Limit  Glass Expense	\$50,000
Limit	
Interruption of Computer Operations	Actual Loss Sustained
Limit	
Liquor Liability	\$10,000
Liquor Liability Option	
Common Cause Limit	Liquor Liability Coverage
Aggregate Limit	\$1,000,000
Gross Annual Liquor Receipts	\$2,000,000
oss by Theft of furs, fur garments, garments trimmed with fur	\$100,000
	\$2,500
oss by Theft of jewelry, watches, watch movements, jewels, pearls, proof of silver, platinum and other precious alloys or metals  Limit	recious and semi-precious stones, bullio
	\$5,000
oss by Theft of patterns, dies, molds and forms Limit	
Money Orders and "Counterfeit Money"	\$2,500
Limit	
Newly Acquired Or Constructed Property - Buildings	\$1,000
Limit	250/ of B. III.
	25% of Building Limit/Not more than
Newly Acquired Or Constructed Property - Business Personal Property	\$500,000/Bldg
Limit	\$250,000
Personal Effects	- Ψ250,000
Limit	\$5,000
Personal Property Off Premises	<b>40,500</b>
Limit	\$10,000
Pollutant Clean Up and Removal	
Limit	\$10,000
	\$10,000

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206 Effective Date: 09/21/2016

Certified Acts Include Coverage



### BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2017

AmGUARD Insurance Company
A Stock Company

Policy No.: NOBP827149

Renewal of: NOBP749206

#### POLICY INFORMATION PAGE

[1] Named Insured and Mailing Address

Noodle Inc 3693 Main Street College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE 103 Midway Drive Suite A Cornelia, GA 30531

[3] Policy Period

From September 21, 2017 to September 21, 2018, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Full-Service Restaurants

[5] Coverage

This policy consists of the Coverage Forms listed on the Schedule of Forms and Endorsements (IIT SF 01 05).

[6] Premium

The premium shown below may be subject to adjustment.
Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE



[7] Payment of Premium

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.



BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2017

Policy No.: NOBP827149

Effective Date: 09/21/2017

### SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001

3693 Main Street College Park, GA 30337

**Fulton County** 

Property Deductible: \$1,000

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

#### **COVERAGES:**

Awnings Coverage Limit	
Building Coverage	\$2,500
Limit	
Valuation	\$465,479
Inflation Guard %	Replacement Cost
Business Personal Property Coverage	2
Limit Coverage	
Seasonal Increase Percent	\$128,900
Valuation	25
Liability	Replacement Cost
IMPORTANT NOTE	
IMI SICIANI NOTE	THIS COVERAGE IS RATED BASED ON
	AN ESTIMATE AND IS SUBJECT TO
Gross Sales at this Location	AUDIT
Limit	\$350,000
Accounts Receivable	Included
On-Premises Limit	
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	0.507.70
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	
Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit	
Outdoor Property	\$10,000
Limit	
Outdoor Signs - Optional Coverage	\$10,000
Limit	05.000
A CONTRACTOR OF THE PROPERTY O	\$5,000

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2017

Policy No.: NOBP827149	Effective Date: 09/21/2017	
Restaurant Coverage		
Food contamination Limit		
Advertising Expense Limit	\$10,000	
Spoilage Per Occurrence Limit	\$3,000	
Brands and Labels	\$10,000	
Delivery Errors and Omissions	BPP Limit	
Fine Arts	\$10,000	275
Reward Payment	\$25,000	
Lock Replacement	\$5,000	
Merchandian With december	\$1,000	
Merchandise Withdrawal Expenses	\$25,000	
Ordinance or Law - Equipment Coverage	Building/BPP Limit	
Credit Card Slips	\$10,000	2.25.72
/aluable Papers and Records	Y 101000	
On-Premises Limit	\$25,000	No.
Off-Premises Limit	\$25,000	
Vater Back-up and Sump Overflow	Ψ25,000	
Covered Property Limit	¢E 000	TO SET
Business Income and Extra Expense Limit	\$5,000	
	\$5,000	

LOCATION: 002 BUILDING: 001

903A W Peachtree St Atlanta, GA 30309 Fulton County

Property Deductible: \$1,000

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

#### **COVERAGES:**

**Awnings Coverage** 

Limit  Business Personal Property Coverage	\$2,500
Limit	\$257,700
Seasonal Increase Percent Valuation	25
Liability	Replacement Cost
IMPORTANT NOTE	
	THIS COVERAGE IS RATED BASED ON AN ESTIMATE AND IS SUBJECT TO AUDIT
Gross Sales at this Location	\$250,000
Limit	Included
Accounts Receivable	Holdecu
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Debris Removal Limit	
	25%/\$10,000
Equipment Breakdown Coverage (HSB)	
Inspection Contact Name Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	
Off Premises Limit	\$5,000
On Fremises Limit	\$5,000

## BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2017

Policy No.: NOBP827149	Effective Date: 09/21/2017
Ordinance or Law - Increased Cost Of Construction	
Limit Limit	
Outdoor Property	\$10,000
Limit	
Outdoor Signs - Optional Coverage	\$10,000
Limit	
Restaurant Coverage	\$5,000
Food contamination Limit	
Advertising Expense Limit	\$10,000
Spoilage Per Occurrence Limit	\$3,000
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000
Lock Replacement	\$5,000
Merchandise Withdrawal Expenses	\$1,000
Ordinance or Law - Equipment Coverage	\$25,000
Credit Card Slips	Building/BPP Limit
Valuable Papers and Records	\$10,000
On-Premises Limit	
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	\$25,000
Covered Property Limit	
Business Income and Extra Expense Limit	\$5,000
moome and Extra Expense Limit	\$5,000

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2017

Policy No.: NOBP827149

Effective Date: 09/21/2017

### SECTION II - LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

	of Insurance
Liability and Medical Expenses - Each Occurrence General Aggregate (Other than Products and Completed Operations) Products & Completed Operations Aggregate Medical Expenses (Each Person) Liability Property Damage Deductible Liability Deductible - Bodily Injury	\$1,000,000 \$2,000,000 \$2,000,000 \$5,000 None None

BUSINESSOWNER'S POLICY DECLARATIONS

Effective Date: 09/21/2017

Issued: 08/17/2017

Policy No.: NOBP827149

### POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

_	
Appurtenant Structures	
Business Income & Extra Expense	\$50,000 combined Building/BPP
Limit	And the second s
Damage To Premises Rented To You	Actual Loss Sustained up to 12 Months
Limit	INVESTMENT OF THE PROPERTY OF
Electronic Data	\$50,000
Limit	\$10,000
Employee Dishonesty	Ψ10,000
Limit	\$10,000
Fire Department Service Charge Limit	
Fire Extinguisher Systems Recharge Expense	\$25,000
Limit Systems Recharge Expense	The second secon
Forgery or Alteration	\$5,000
Limit	Total approximation and the second
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	\$10,000
Property Limit	
Business Income/EE Number of Days	\$15,000
Fungi or Bacteria Property Damage Aggregate Limit	30
Glass Expense	\$50,000
Limit	Actual Loss Sustained
nterruption of Computer Operations	Actual Loss Sustained
Limit Liquor Liability	\$10,000
Liquor Liability Option	territoria de la companya de la comp
Common Cause Limit	Liquor Liability Coverage
Aggregate Limit	\$1,000,000
Gross Annual Liquor Receipts	\$2,000,000
oss by Theft of fure fur garmanta	\$100,000
oss by Theft of furs, fur garments, garments trimmed with fur	
	\$2,500
oss by Theft of jewelry, watches, watch movements, jewels, pearls, proof of silver, platinum and other precious alloys or metals	recious and semi-precious stones, bullion
Limit	Mining and Annual Annua
oss by Theft of patterns, dies, molds and forms	\$5,000
Limit	42 FOO
Money Orders and "Counterfeit Money"	\$2,500
Limit	\$1,000
lewly Acquired Or Constructed Property - Buildings	\$1,000
Limit	25% of Building Limit/Net
	25% of Building Limit/Not more than \$500,000/Bldg
lewly Acquired Or Constructed Property - Business Personal Property	
Limit	\$250,000
ersonal Effects Limit	The second secon
ersonal Property Off Premises	\$5,000
Limit Property Off Premises	
ollutant Clean Up and Removal	\$10,000
Limit	
reservation of Property	\$10,000
Limit	U.A. (C.C.)
errorism	Within 30 Days

**BUSINESSOWNER'S POLICY DECLARATIONS** 

Issued: 08/17/2017

Policy No.: NOBP827149

Effective Date: 09/21/2017

Certified Acts
Include Coverage



### BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2018

### AmGUARD Insurance Company A Stock Company

Policy No.: NOBP929994

Renewal of: NOBP827149

#### POLICY INFORMATION PAGE

[1] Named Insured and Mailing Address

Noodle Inc 3693 Main Street College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE 103 Midway Drive Suite A Cornelia, GA 30531

[3] Policy Period

From September 21, 2018 to September 21, 2019, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Full-Service Restaurants

[5] Coverage

This policy consists of the Coverage Forms listed on the Schedule of Forms and Endorsements (IIT SF 01 05).

[6] Premium

The premium shown below may be subject to adjustment.
Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE



[7] Payment of Premium

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.



ATTACHMENT "F"

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

### SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001

3693 Main Street College Park, GA 30337

**Fulton County** 

Property Deductible: \$1,000

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

#### **COVERAGES:**

Awnings Coverage	
Limit Building Coverage	\$2,500
Limit	
Valuation	\$474,789
Inflation Guard %	Replacement Cost
Exclude From Blanket?	2
Business Personal Property Coverage	No
Limit Coverage	STOCK TOWN IN THE PROPERTY AND ADDRESS OF THE PROPERTY AND
Seasonal Increase Percent	\$128,900
Valuation Valuation	25
Liability	Replacement Cost
IMPORTANT NOTE	
IIII GIOANTNOTE	THIS COVERAGE IS RATED BASED ON
	AN ESTIMATE AND IS SUBJECT TO
Gross Sales at this Location	AUDIT
Limit	\$350,000
Accounts Receivable	Included
On-Premises Limit	
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	
Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	22 manual contract to the security of the secu
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit	
Outdoor Property	\$10,000
Limit	
Outdoor Signs - Optional Coverage	\$10,000
	and a state of the

# BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2018

Policy No.: NOBP929994	Effective Date: 09/21/2018
Limit	
Restaurant Coverage	\$5,000
Food contamination Limit	
Advertising Expense Limit	\$10,000
Spoilage Per Occurrence Limit	\$3,000
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000
Lock Replacement	\$5,000
Merchandise Withdrawal Expenses	\$1,000
Ordinance or Law - Equipment Coverage	\$25,000
Credit Card Slips	Building/BPP Limit
Valuable Papers and Records	\$10,000
On-Premises Limit	
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	\$25,000
Covered Property Limit	
Business Income and Extra Expense Limit	\$5,000
	\$5,000

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

### SECTION II - LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

Coverage	Limits of Insurance
Liability and Medical Expenses - Each Occurrence General Aggregate (Other than Products and Completed Operations) Personal & Advertising Injury Products & Completed Operations Aggregate Medical Expenses (Each Person) Liability Property Damage Deductible Liability Deductible - Bodily Injury	\$1,000,000 \$2,000,000 Included \$2,000,000 \$5,000 None

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

### POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Limit  Business Income 9 F. ( F	\$50,000 combined Building/BPP
Business Income & Extra Expense Limit	College Soft British (ed Building/BPP
Damage To Premises Rented To You	Actual Loss Sustained up to 12 Months
Limit	\$50,000
Electronic Data	\$30,000
Limit	\$10,000
Employee Dishonesty Limit	410,000
	\$10,000
Fire Department Service Charge Limit	
Fire Extinguisher Systems Recharge Expense	\$25,000
Limit Control of Stems Recharge Expense	
Forgery or Alteration	\$5,000
Limit	
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	\$10,000
Property Limit	
Business Income/EE Number of Days	\$15,000
Fungi or Bacteria Property Damage Aggregate Limit	30
Glass Expense	\$50,000
Limit	Actual Loss Sustained
Interruption of Computer Operations	Actual Loss Sustained
Limit	\$10,000
Liquor Liability	Ψ10,000
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
IMPORTANT NOTE	THIS COVERAGE IS RATED BASED ON
	AN ESTIMATE AND IS SUBJECT TO
Loss by Theft of furs, fur garments, garments trimmed with fur	AUDIT
Limit Limit of fur garments, garments trimmed with fur	
	\$2,500
oss by Theft of jewelry, watches, watch movements, jewels, pearls, proold, silver, platinum and other precious alloys or metals	ecious and semi-precious stones, bullion
Limit Limit	NONE AND
oss by Theft of patterns, dies, molds and forms	\$5,000
Limit	\$2.500
Money Orders and "Counterfeit Money" Limit:	\$2,500
	\$1,000
Newly Acquired Or Constructed Property - Buildings Limit	
	25% of Building Limit/Not more than
lewly Acquired Or Constructed Property - Business Personal Property	
Limit Limit	
Personal Effects	\$250,000
Limit	25.000
Personal Property Off Premises	\$5,000
Limit	\$10,000
ollutant Clean Up and Removal	\$10,000
Limit	\$10,000

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GUARD00438

BUSINESSOWNER'S POLICY DECLARATIONS

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

Preservation of Property

Limit

Terrorism Within 30 Days

Certified Acts

Include Coverage

# IN THE STATE COURT OF DEKALB COUNTY STATE OF GEORGIA

HEE JIN LOWERY and JOHN LOWERY,	)	
Plaintiffs,	)	
v.	)	CIVIL ACTION FILE NO.:
NOODLE LIFE, INC., SHOU & SHOU, INC.,	)	19A75644
Defendants	)	

### CONSENT JUDGMENT AS TO SHOU & SHOU, INC.

WHEREAS, Plaintiffs and Defendant Shou & Shou, Inc. agree to a consent judgment in the amount of \$900,000.00 in favor of Plaintiff Hee Jin Lowery against Defendant Shou & Shou, Inc. and \$100,000.00 in favor of Plaintiff John Lowery against Defendant Shou & Shou, Inc.; and

WHEREAS, as consideration for this consent judgment, Plaintiffs have agreed not to satisfy or attempt to satisfy any amounts owed under this judgment against the personal assets of Defendant Shou & Shou, Inc., and to only satisfy this judgment to the extent that the defendant's insurer and/or insurance broker can be held responsible for the judgment; and

WHEREAS, in further consideration of this consent judgment, Defendant Shou & Shou, Inc. has agreed to assign any claims it has against his/her insurer AmGUARD Insurance Company and any other insurance company and its insurance broker, to Plaintiffs; and

WHEREAS, this consent judgment represents a compromise settlement of Plaintiffs' claims against Shou & Shou, Inc. to avoid the uncertainties of trial and does not fully and completely compensate Plaintiffs for all economic and non-economic damages.

IT IS HEREBY ORDERED AND ADJUDGED that judgment be entered in favor of plaintiff Hee Jin Lowery against Defendant Shou & Shou, Inc. in the amount of \$900,000.00 with post-judgment interest as allowed by law, that judgment be entered in favor of plaintiff John Lowery against Defendant Shou & Shou, Inc. in the amount of \$100,000.00 with post-judgment interest as allowed by law, and that Defendant Shou & Shou, Inc. execute an assignment to the Plaintiffs of its claims against its insurer, AmGUARD Insurance Company, and any other insurance company and against its insurance broker in order for Plaintiffs to pursue collection of this judgment.

FURTHER, pursuant to O.C.G.A. § 9-11-54(b), the Court finds no just reason for delay and expressly directs entry of <u>final</u> judgment as set forth above in favor of Plaintiffs Hee Jin Lowery and John Lowery. Plaintiffs' action against Defendant Noodle Life, Inc. will remain pending and proceed to trial.

SO ORDERED this 6th day of July , 2020.

HONORABLE KIMBERLY ANDERSON Judge, State Court of DeKalb County

CONSENTED TO:

DAVID P. DEKLE, P.C.

David P. Dekle

Georgia Bar No. 216590 3506 Professional Circle

Suite A

Augusta, Georgia 30907

LAW OFFICE OF IVAN GUSTAFSON

Ivan A. Gustafson

Georgia Bar No. 001630

69 Lawrenceville St. McDonough, GA 30253

Telephone: (770) 626-1626

STATE COURT OF DEKALB COUNTY, GA. 7/7/2020 11:31 AM

E-FILED

BY: Michelle Cheek

Telephone:

(706) 922-7460

Facsimile:

(706) 243-4656

Facsimile:

Attorney for Defendants

Shou & Shou, Inc.

(770) 212-2345

THE LAW OFFICE OF ANDREW

HOLLIDAY

Andrew W. Holliday Georgia Bar No. 74692 (2010)

11175 Cicero Drive

Suite 100

Alpharetta, Georgia 30022

Telephone:

(678) 646-6711

Facsimile:

(678) 802-2129

Attorneys for Plaintiffs

# ASSIGNMENT AND COVENANT NOT TO SEEK COMPENSATION DIRECTLY FROM SHOU & SHOU, INC.

For and in consideration of the sum of one dollar and other good and valuable consideration, the acceptance of which is hereby acknowledged, Shou & Shou, Inc. sells, assigns and transfers all of its right, title and interest, which exists now, or which may exist in the future, to any and all claims or rights of any kind against AmGUARD Insurance Company or any other insurer for failing to defend, prosecute, settle, pay or otherwise resolve the claims of Hee Jin Lowery and John Lowery against Shou & Shou, Inc. including, but not limited to, failing to defend, prosecute, settle, pay or otherwise resolve the claims pending in the case styled *Hee Jin Lowery and John Lowery v. Noodle Life, Inc. and Shou & Shou, Inc.* pending in State Court of DeKalb County, State of Georgia, Civil Action No. 19A75644.

In particular, this assignment is designed and intended to allow Hee Jin Lowery and John Lowery to prosecute an action against AmGUARD Insurance Company or any other insurer to recover the consent judgment they obtained against Shou & Shou, Inc. arising out of an incident that occurred on or about July 26, 2017, in the action captioned *Hee Jin Lowery and John Lowery v. Noodle Life, Inc. and Shou & Shou, Inc.* pending in State Court of DeKalb County, State of Georgia, Civil Action No. 19A75644, (A copy of the consent judgment is attached as Exhibit "A"), including, but not limited to, any claims for negligent failure to settle, bad faith failure to settle and wrongful denial of coverage.

In addition to the sum of one dollar, and as further consideration for this assignment and in exchange for this assignment, Hee Jin Lowery and John Lowery promise to forgo any right to seek compensation directly from Shou & Shou, Inc. Instead, Hee Jin Lowery and John Lowery



promise to pursue the complete amount of the compensation owed them by Shou & Shou, Inc. directly from AmGUARD Insurance Company or other insurers and from its insurance broker.

Additionally, for and in consideration of the sum of one dollar and other good and valuable consideration, the acceptance of which is hereby acknowledged, Shou & Shou, Inc. sells, assigns and transfers all of its right, title and interest, which exists now, or which may exist in the future, to any and all claims or rights of any kind against its insurance broker, Ash Welborn Insurance Agency, its agents and employees, for breach of contract, negligence and all other causes of action, known and unknown, for failure to procure insurance. In particular, this assignment is designed and intended to allow Hee Jin Lowery and John Lowery to prosecute an action against Ash Welborn Insurance Agency, its agents and employees or any other insurance broker for failing to procure insurance for Shou & Shou, Inc. in the amount of \$1 million dollars which would have been in full force and effect on or about July 26, 2017, when injury and damage to Hee Jin and John Lowery occurred.

Shou & Shou, Inc. further agrees to assist the Plaintiffs in the prosecution of any assigned claims, including but not limited to: (a) providing Plaintiffs with open access to its books, records, employees, documents and evidence, to the extent that is reasonably required to effectuate a successful prosecution of any assigned claims; and (b) executing any documents necessary to assign to Plaintiffs Shou & Shou's rights under any policy issued by any of Defendant's liability insurance carriers that may benefit the Plaintiffs.

This assignment is to be interpreted under the laws of Georgia, and the parties hereto intend for it to be interpreted to allow Hee Jin and John Lowery to pursue AmGUARD Insurance Company or any other insurers and Ash Welborn Insurance Agency, its agents and employees,

for the full amount of the judgment they obtained against Shou & Shou, Inc., including penalties, post judgment interest, and all other damages allowed by law.

This \_\_\_\_\_\_ day of June, 2020. Lena Shou Kuo Sworn to and subscribed before me Approved by: this 24/ day of June, 2020. Ivan A. Gustafson Notary Public My commission expires: Hee Jin Lowery Sworn to and subscribed before me Approved by:

Notary Public

My comm

David P. Dekle